



Evaluation, Ranking, and Reallocation Policy for HUD CoC Funding Requests

The following policy and procedures apply to the HUD Continuum of Care competition.

Overview of Evaluation and Ranking Process

The CoC Compliance and Evaluation (C&E) Committee is responsible for establishing and executing a process to review and rank project applications submitted for U.S. Department of Housing and Urban Development (HUD) funding through the CoC. In the work of monitoring and evaluating funded agencies and project applicants, the Committee may request data from other CoC Committees to better inform their process. The C&E Committee collects and reviews spending and program activity reports of funded agencies on a quarterly basis. Site monitoring visits of agencies are conducted by the Committee on an as-needed basis.

All Committee members must also be able to dedicate time for application review and committee meetings. It is an ongoing effort of the CoC to make monitoring, evaluation, and ranking activities an objective process.

Overview of Application Process and Timeline

The application process and timeline will vary per guidelines outlined in each year's Notice of Funding Availability (NOFA) from HUD. The CoC website and emails will be used as the primary mode of communication for updates on the NOFA and review and ranking procedures. Transparency of the application process will be a priority for the Committee and the Collaborative Applicant.

CoC Evaluation and Ranking Procedures

The C&E Committee will ensure that evaluation and ranking procedures adhere to HUD guidelines and best practices on effective ways to review and rank project applications. The C&E Committee acts as an advisory and steering committee for an Ad Hoc Ranking and Prioritization Committee which consists of nonfunded community representatives with no conflict of interest, to review and rank project applications. The CoC Collaborative Applicant will provide the committee with project applications and supporting documents that are received in response to a NOFA. If Committee members have any information and/or knowledge that might cause HUD to deny funding for a project, they will provide that information to the Committee.

The Ad Hoc Committee will take the following steps in order to determine ranking:

- 1) Review and discuss all project applications and supporting documents provided by the Collaborative Applicant.

- 2) Prioritize and rank project applications and create a Project Priority Listing.
 - a. The criteria used to determine prioritization may vary slightly per year, but should include HMIS data, spending reports, and performance reports.
 - b. The CoC has determined to always rank the HMIS Renewal Project in Tier 1, as [HMIS participation is a statutory requirement of recipients and sub-recipients of the CoC Program.](#)

- 3) The Committee will either accept an application as it is submitted, accept an application under the condition that amendments outlined by the Committee are made, or reject an application.
 - a. The Committee must list the amendments to be made and can decide to reject an application if such amendments are not made.
 - b. When rejecting applications, the Committee must list the reason(s) why the application was rejected.

- 4) Upon creating a Project Priority Listing, the Committee must share this with the Collaborative Applicant, who will then contact all applicants with a written letter that describes the outcome of their application(s).
 - a. The Collaborative Applicant is also responsible for posting the finalized Project Priority Listing for public comment.

Again, it is important to note that the exact timeline for the above activities may vary per year depending on the content of that year's NOFA. As such, an explicit timeline is not included in this policy.

The following is a non-exhaustive list of items that might cause the Committee to recommend a project not be funded or to be funded at a lower level.

- Failure to submit a timely application
- Insufficient information provided in application
- Project consistently fails to meet performance standards
- Applicant fails to actively participate in CoC activities, such as meetings or events
- Applicant shows an unwillingness to adapt their program to the changing needs of the community and the HEARTH Act
- Applicant applying for a new project has an existing DHCD or HUD CoC-funded project with poor performance
- Lack of sufficient HUD funding to fund all project applications received
- Lack of demonstrated capacity to manage grant funding in accordance with HUD requirements and policies

Reallocation Policy

Under the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH), the HUD reallocation process allows Continuums of Care (CoC) to reallocate funds from renewal projects to provide funding for new projects and to create additional permanent housing. It is therefore the intent of the Western Virginia Continuum of Care to develop a Reallocation Policy that is: aligned with HUD and HEARTH Act policy guidance; performance-based as specified with the annual HUD NOFA; and finally, based upon local needs, data and use of common assessment tool.

Performance Measures

To provide both project-specific outcome information and CoC-wide contributions, each CoC-funded program will be evaluated based on the Project Application submitted for the CoC proposal, the Annual Performance Report (APR) outcomes submitted to HUD, data entered into HMIS, expenditure of CoC grant funds, and other HUD-recommended data tools.

- 1) ***Annual Performance Report Outcomes***. The APR scoring criteria assess outcomes which directly relate to goals set by HEARTH including reducing the length of homelessness, reducing returns to homelessness and increasing income. APR outcomes are also factored into the Performance Scorecard used during the CoC project scoring cycle.
- 2) ***Outcomes Impacting CoC Score***. Performance measures will be guided by the outcomes that are reported each year in the HUD Consolidated Application and impact the CoC score. As HEARTH performance measures are identified through the forthcoming Continuum of Care regulations, the measures used for the renewal/threshold evaluations will be revised. Program outcomes will be collected via the Performance Scorecard during the CoC project scoring cycle.
- 3) ***HMIS Data Quality***. Programs will be evaluated on their HMIS quality for the operating year. It is expected that programs will have no more than 3% missing data/5% SSN numbers, except for Outreach programs that allow 10%, for any of the universal data elements. Programs are able to correct incomplete data to improve the percentages. Data quality outcomes will be collected via the Performance Scorecard during the CoC project scoring cycle.
- 4) ***Expenditure of CoC Grant Funds***. HUD and the Western Virginia CoC expect homeless assistance resources to be fully utilized. CoC site reviews of grantees will include criteria to determine whether any HUD funds recaptured at the completion of the most recent grant, how much money was recaptured, and whether actions have been taken to assure that grant funds will not be recaptured in the current program year. Data on expenditure of CoC Grant Funds will be collected via the Site Review Scorecard.
- 5) ***Goals to Prevent and End Homelessness***. In alignment with Opening Doors: The Federal Strategic Plan to Prevent and End Homelessness, our community's goals are as follows: 1) Help individuals experiencing homelessness transition to permanent housing and have the skills

necessary to achieve self-sufficiency; 2) Work together to be more effective in reducing homelessness in the region.

Reallocation Scenarios and Eligibility

- 1) HUD CoC funding reallocation can occur following the scenarios below:
 - a. Sub-recipient no longer interested in continuing the project or part of the project.
 - b. Sub-recipient no longer needs the CoC funding as other funding is available for the project or part of the project.
 - c. Sub-recipient underperforms and the CoC and its executive committee decide to reallocate the full or partial funding of the project to a new sub-recipient.
- 2) A reallocation project is eligible to be funded if the following apply:
 - a. The reallocation project is for an eligible project type. HUD determines eligible reallocation project types in the CoC NOFA each year.
 - b. The reallocation project meets all of HUD's threshold requirements.

The Western Virginia CoC has the authority reallocate funds granted through the CoC program as needed to more effectively resolve homelessness, help households achieve stable housing, and improve CoC performance. CoC program funds may be reallocated either by a voluntary process or by a competitive process.

Procedure for Voluntary Reallocation Process

- 1) CoC grantees are able to self-nominate to voluntarily reallocate CoC renewal funds to create a new project. The CoC Lead Agency may initiate a competitive system transformation process due to a renewal grantee voluntarily ending a CoC project. A grantee seeking to reallocate funding through the voluntary process must do so in accordance with the timeline set by the CoC Lead agency in that year's application process and if applicable, complete a new project application by the deadline set by the CoC Lead agency in order to be eligible and considered.
- 2) The CoC Scoring Committee will review the application and make a determination regarding the acceptance and ranking of the proposed project, and whether or not it will be included in the Western Virginia CoC funding application to HUD.
- 3) If the proposed new project is not accepted by the CoC Scoring Committee, the committee may choose to allow the renewal project to remain in place, or release the funds to the community for competitive bid.

Procedure for Competitive Reallocation Process

- 1) The CoC Ad Hoc Ranking and Review Committee reserves the right to reallocate renewal funding and make it available for new projects through a competitive process. As part of the annual process for renewal projects, applicants are required to supply information so that it can be determined if each renewal project meets local and federal threshold requirements.
- 2) If it is determined that a renewal project does not meet minimum threshold requirements, an emergency meeting of the CoC Executive Committee will be held to determine whether or not funds should be released through the competitive reallocation process. The following process will be followed:
 - a. Due to the time constraints involved in grant applications, voting may be handled via conference call, e-mail or website communication.
 - b. Any member of the Executive Committee whose agency receives funding through the CoC program shall recuse him or herself from the committee deliberation process.
 - c. The Executive Committee will make the final decision whether or not to reject the renewal application for any agency that does not meet the minimum threshold requirements.
 - d. All committee deliberations will be documented in meeting minutes.
 - e. If any renewal projects' application is rejected, the funds that were allocated to that project will be released as new funds and agencies in the Western Virginia CoC geographic region will have the opportunity to bid for them.

Reallocation will occur in a transparent, universal, and performance-based manner.

Appeals of Ranking/Funding Level

Project applicants may appeal funding decisions made by the C&E Committee. Instructions on how to do so are outlined in the NOFA and must be adhered to in order for an appeal to be considered. The C&E Committee and Collaborative Applicant will follow instruction from HUD on how to respond to appeals.